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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	CASE NO. 2:13-cr-00018-JCM-GWF
)	
Plaintiff,)	
)	
v.)	STIPULATION TO CONTINUE PRE-
)	SENTENCE REPORT INITIAL DUE
CHARLES MCCHESENEY,)	DATE
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED by and between THOMAS B.W. HALL, and DOUGLASS MITCHELL, ESQ., counsel for defendant Charles McChesney, that the Probation Office's Pre-Sentence Report ("PSR") initial deadline (currently June 15, 2015) be extended one week to June 22, 2015.

This Stipulation is entered into for the following reasons:

1. On January 27, 2015, Defendant Charles McChesney entered a plea of guilty to the wire fraud and conspiracy to commit wire and mail fraud charges against him.
2. Defendant McChesney's sentencing is set for July 20, 2015, and his initial PSR is due to counsel for the Government and defense counsel on June 15, 2015.

- 1 3. On June 15, 2015, the Court will hold an evidentiary hearing regarding loss in this
2 matter, and on June 17, 2015, the Court will sentence defendants Keith Gregory,
3 Salvatore Ruvolo, David Ball, and Edith Gillespie.
- 4 4. The evidentiary hearing and the sentencing will provide clarity to the Government
5 and to defense counsel regarding the Court's approach to loss and restitution
6 issues, and therefore inform the approach to be taken with the PSR.
- 7 5. Counsel for the United States has spoken to Ms. Sandi Schmidt of the Probation
8 Office, and she requested that the parties enter into this stipulation.

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10 DATED this 12th day of June, 2015.

11 Respectfully submitted,

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13 /s/ Thomas B.W. Hall
14 THOMAS B.W. HALL
15 Trial Attorney

/s/ Douglass Mitchell
 DOUGLASS MITCHELL
 Counsel for Defendant Charles McChesney

16
17
18 DATED June 15, 2015.

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20 IT IS SO ORDERED.

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22 
23 HON. JAMES C. MAHAN
24 UNITED STATES DISTRICT JUDGE
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	CASE NO. 2:13-cr-00018-JCM-GWF
)	
Plaintiff,)	
)	
v.)	CERTIFICATE OF SERVICE
)	
CHARLES MCCHESENEY,)	
)	
Defendant.)	

I, the undersigned, hereby certify that this pleading was filed with the clerk of court via ECF and will be served electronically via ECF on all parties that have entered their appearances in this case.

Dated: June 12, 2015

Respectfully submitted,

/s/ Thomas B.W. Hall
THOMAS B.W. HALL
Trial Attorney
United States Department of Justice
Criminal Division, Fraud Section